

## **REMARKS**

Claims 9-42 remain pending after entry of the present Request for Reconsideration.

### **Rejections under 35 U.S.C. § 103**

5           Independent claims 9 and 21 continue to be rejected under 35 U.S.C. 103(a) as being unpatentable over Smith et al. ("Smith") (U.S. Patent No. 6,222,537 B1) and Ezekiel et al. ("Ezekiel") (U.S. Patent No. 5,625,783). Also, independent claims 35 and 42 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Smith and Ezekiel. These rejections are respectfully traversed.

10           The current rejections of claims 9 and 21 are identical to the rejections provided in the Office Action dated August 14, 2002. Therefore, the Applicant's arguments presented in the Amendment submitted on November 14, 2002, continue to apply to the current rejections of claims 9 and 21.

            With regard to claims 35 and 42, the Office has rejected these claims using the  
15   same bases of rejection as applied to claims 9 and 21. More specifically, the Office has relied on the cited art as follows: Smith column 2, lines 36-45; Smith column 4, lines 13-14; Smith column 4, lines 41-49; Smith column 4, lines 46-47; Ezekiel abstract; and Ezekiel column 3, lines 11-36. Therefore, the Applicants submit that the arguments presented with respect to claims 9 and 21 in the Amendment of November 14, 2002, are  
20   equally applicable to the rejections of claims 35 and 42.

            Each of claims 9, 21, 35, and 42 require "a document viewer for displaying a document or modifying the document within a component based application program." Furthermore, each of claims 9, 21, 35, and 42 require "the document viewer having a user interface requirements specification referencing at least one user interface component."

The Office has inappropriately relied on Smith, column 4, lines 13-14, to teach "a document viewer for displaying a document or modifying the document within a component based application program." Smith, column 4, lines 12-16, states the following: "A button control which is set to trigger turning to a new page of text when pressed may  
5 have associated with its hovering state an animation sequence comprising images of a book which give the appearance of turning pages when the images are cycled through." The teaching of Smith, column 4, lines 12-16, is provided as an example in a context of discussing how an interface creator can associate "a series of images for an animation sequence with a 'hovering' state of an interface control (a state in which a mouse pointer is  
10 over the control but no mouse button has been pressed), which animation sequence suggests the function that will be triggered by further user interaction." The Office has not particularly pointed out how citation of the "button control which is set to trigger turning a new page of text when pressed," as expressed in the exemplary context of Smith, column 4, lines 12-16, teaches or suggests "a document viewer for displaying a document or  
15 modifying the document within a component based application program." Simply stated, the "button control," as identified in the example provided by Smith, is not "a document viewer" as claimed by the present invention.

The Office has inappropriately relied on Smith, column 4, lines 41-49, to teach "the document viewer having a user interface requirements specification referencing at least one  
20 user interface component." Smith, column 4, lines 41-49, states the following: "The interface builder tool includes: a set of definitions of selectable user interface control types including, for each control type, one or more predefined functions and a predefined state model defining a set of operational states and transitions between the states; means for generating a user interface control of a selected control type; and means for associating  
25 property attributes with one or more specific operational states of a user interface control."

The teaching of Smith, column 4, lines 41-49, does not teach or suggest "a user interface requirements specification" for "a document viewer." Notwithstanding the fact that Smith does not teach "a document viewer," as previously discussed, the Office has not particularly pointed out how Smith, column 4, lines 41-49, teaches or suggests "the  
5 document viewer having a user interface requirements specification." The teachings of Smith, column 4, lines 41-49, are related to "a set of definitions of selectable user interface control types", wherein "user interface control types" correspond to "user interface components" in the presently claimed invention. The "user interface components" in the presently claimed invention are not synonymous with "a user interface requirements  
10 specification" of a "document viewer." Furthermore, the "user interface components" in the presently claimed invention are actually required to be referenced by the "user interface requirements specification." Therefore, the Applicants submit that the office has not provided evidence of a prior art teaching or suggestion of "the document viewer having a user interface requirements specification referencing at least one user interface component"  
15 as required by the presently claimed invention.

Additionally, with respect to claim 35, the Office has not cited any references that would indicate a prior teaching or suggestion of "an application proxy to manage communication between said renderer, said document viewer, and said at least one user interface component such that said graphical user interface is rendered upon a change in  
20 said present context." To establish a *prima facie* case of obviousness, the references when combined must teach or suggest all the claim limitations.

Additionally, with respect to claim 42, the Office has not cited any references that would indicate a prior teaching or suggestion of the following claim elements:

"defining a graphical user interface layout for at least said at least one application program component, said graphical user interface layout defining a position and an arrangement for said at least one user interface component in said at least one context;

instantiating said at least one user interface component and associating it with said  
5 at least one application program component;

determining a present context of said application program and rendering said graphical user interface in accordance with said graphical user interface layout defined for said present context; and

rerendering said graphical user interface each time said present context of said  
10 application program changes."

Again, to establish a *prima facie* case of obviousness, the references when combined must teach or suggest all the claim limitations.

In summary, the Office has not established a *prima facie* case of obviousness with respect to independent claims 9, 21, 35, and 42, because the references when combined do  
15 not teach or suggest all of the claim limitations. Furthermore, there is neither suggestion nor motivation, in either the references or in the knowledge of one having ordinary skill in the art at the time of the invention, to have combined the references in the manner proposed. Since dependent claims 10-20, 22-34, and 36-41 incorporate all elements and limitations of independent claims 9, 21, and 35, respectively, the applicants submit that  
20 these dependent claims are patentable for at least the same reasons that independent claims 9, 21, and 35 are patentable over the cited art of record. For at least these reasons, the Applicants respectfully request that the rejections of claims 9-42 be withdrawn.

In accordance with the foregoing, a Notice of Allowance is respectfully requested. The Examiner is respectfully requested to provide an answer to this Request for  
25 Reconsideration in an expedited manner to allow the Applicants optimum time to consider

future prosecutorial action. If the Examiner has any questions concerning the present amendment, the Examiner is kindly requested to contact the undersigned at (408) 749-6900 ext. 6914. If any other fees are due in connection with filing this amendment, the Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No. 5 ROXIP259). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,  
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